

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:23-CR-35-O

MEHDI DARIGAN (01)

**FACTUAL RESUME**

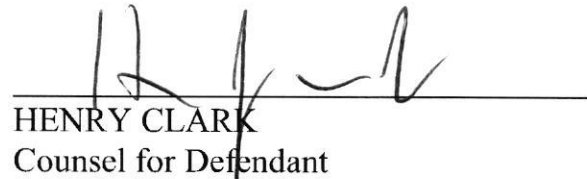
- I. Indictment: Count Two alleges possession of a controlled substance with intent to distribute, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C).
- II. Penalties: The penalties the Court can impose include:
- a. imprisonment for a period not to exceed 20 years;
  - b. a fine not to exceed \$1,000,000, or both a fine and imprisonment;
  - c. a term of supervised release not to exceed 3 years, which may be mandatory under the law and will follow any term of imprisonment. If the defendant violates any condition of supervised release, the Court may revoke such release term and require that the defendant serve any or all of such term as an additional period of confinement;
  - d. a mandatory special assessment of \$100; and
  - e. costs of incarceration and supervision.
- III. Elements of the Offense: The essential elements which must be proved beyond a reasonable doubt in order to establish the offenses charged in Count Two of the Indictment are as follows:
- First: That the defendant knowingly possessed a controlled substance;
- Second: That the substance was in fact oxycodone; and
- Third: That the defendant possessed the substance with the intent to distribute it.

IV. Stipulated Facts:

On or about September 14, 2022, in the Fort Worth Division of the Northern District of Texas, Mehdi Darigan had in his possession 10 pills containing oxycodone. Darigan knew that the pills contained oxycodone. Darigan possessed the oxycodone pills with the intent to distribute them to others.

AGREED AND STIPULATED this 9th day of March, 2023.

  
MEHDI DARIGAN  
Defendant

  
HENRY CLARK  
Counsel for Defendant